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REMARKS

Claims 1 and 6 are amended. Claims 2-3, 12, and 17 were previously canceled without prejudice or disclaimer. No new matter is added by these amendments. Claims 1, 4-11, 13-16, and 18-20 are pending. Applicant respectfully requests reconsideration and allowance of all claims in view of the amendments above and the remarks that follow.

Claim Rejections under 35 U.S.C. 112

Claims 1, 4-11, 13-16, and 18-20 are rejected under 35 U.S.C. 112 because "no support can be found in the specification for the newly added limitation of 'the relevant significance specifies a different order of the characteristics than the record.'"

Applicant respectfully traverses these grounds for rejection because "the relative significance specifies a different order of the characteristics than the records," is supported by applicant's specification, e.g., in Fig. 5, element 524, at page 11, lines 24-28, which recites: "The relative significance 524 indicates a relative significance of the associated characteristic 522, and the data normalizer 127 uses the relative significance 524 to order the characteristics in the report 136 as further described below with reference to Fig. 7."

Further, "the relative significance specifies a different order of the characteristics than the records," is also supported by Figs. 6A and 6B, which show a different ordering of the characteristics based on the relative significance, as explained in applicant's specification at page 12, lines 22-30 and page 13, lines 1-5, which recites:

"The data normalizer 127 orders the characteristics 672, 674, and 676 in the report 136 based on the relative significance 524 in the model norm 130, which may have a different order from the records 162, e.g., as shown in Fig. 6A.

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Thus, using the example of the model norm 130 in Fig. 5, the zip code characteristic 672 has a relative significance 524 in the model norm 130 of "1," so the zip code characteristic 672 is ordered first (placed in the leftmost column) in the report 136. The income characteristic 674 has a relative significance 524 in the model norm 130 of "2," so the income characteristic 674 is ordered second (placed in the centermost column) in the report 136. The state characteristic 676 has a relative significance 524 of "3," in the model norm 130, so the state characteristic 670 is ordered third (placed in the rightmost column) in the report 136. In other embodiments, the characteristics may be ordered right-to-left, up-to-down, down-to-up, or in any other appropriate order in the report 136 based on the relative significance 524 in the model norm 130."

Claims 1 and 4-10 are rejected under 35 U.S.C. 112 because "the records' lacks antecedent basis." Claims 1 and 6 are amended to recite "the plurality of records," so that "a plurality of records" provides antecedent basis.

Claims 6-10 are rejected because the claims set forth a storage medium comprising a structure by invoking means plus function language, and not instructions for executing a function. Applicant respectfully traverses these grounds for rejection. The Office Action argues that claims 6-10 recite instructions. Applicant respectfully disagrees and points out that none of claims 6-10 recite instructions. Instead, claims 6-10 recite a storage medium, which is an apparatus, that comprises various means, which is statutory under 35 U.S.C. 112.

Claim Rejections under 35 U.S.C. 102 and 103

Claims 1, 4-8, 10, and 14 are rejected under 35 U.S.C. 102(e) as anticipated by US 6,993,533 to Barnes. Claims 11, 13-16, and 18-19 are rejected under 35 U.S.C. 103(a) as unpatentable over Barnes. Claim 9 is rejected under 35 U.S.C. 103(a) as

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unpatentable over Barnes in view of US 5,603,025 to Tabb. Claim 20 is rejected under 35 U.S.C. 103(a) as unpatentable over Barnes and "Default Value" to Pearson.

Applicant respectfully traverses these grounds for rejection because all of the elements of the claims are not taught or suggested by the references, as further argued below.

Claim 1 recites: "ordering the plurality of records in the report based on a sort rule in the model norm," which is not taught by the references alone or in any combination. The Office Action relied on Figure 5 of Barnes for "ordering the plurality of records in the report based on a sort rule in the model norm." Applicant respectfully disagrees for the reasons argued below.

Barnes, Figure 5, illustrates a name 510, a title 512, a subtitle 514, a header logo 516, a footer 520, a template 522, a select statement 522, an employee ID 554, a first name 556, a last name 558, a sum statement 560, an mb_chart 562, an mb_drilldown 564, a from statement 566, employees 568, orders 570, order_details 572, a where statement 574, an employee id 576, an AND statement with an order id 578, and a group by statement 580, none of which teach or suggest "ordering the plurality of records in the report based on a sort rule in the model norm," as recited in claim 1.

The Barnes name 510 merely identifies "the name of the report," as recited at column 12, lines 32-33 and does not teach or suggest a sort order. The Barnes title 512 and subtitle 514 are merely the text: "MoreBetter Traders" and "Employee Listing," which can be seen in Figure 5 and in Figure 7 as the title and subtitle, which does not teach or suggest "ordering the plurality of records in the report based on a sort rule in the model norm," as recited in claim 1. The Barnes header logo 516 is illustrated in Figure 5 as a file name in the "gif" format. The gif format encodes files that contain images, which does not teach or suggest "ordering the plurality of records in the report based on a sort rule in the model norm," as recited in claim 1. The footer 520 is illustrated in Figure 5 as "page {P} of {N} on {D} and {T}," which presumably causes the current page number, the total number of pages, the date, and the time, to be printed near the bottom of

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each page of the report, which does not teach or suggest "ordering the plurality of records in the report based on a sort rule in the model norm," as recited in claim 1. The Barnes template 522, as described at Barnes column 12, lines 36-38 identifies "a report template (such as a bar chart, pie chart, cross table chart, or some combination of charts), which does not teach or suggest "ordering the plurality of records in the report based on a sort rule in the model norm," as recited in claim 1. The Barnes select statement 522 is an SQL statement that specifies records to be retrieved and does not teach or suggest "ordering the plurality of records in the report based on a sort rule in the model norm," as recited in claim 1. The Barnes employee ID 554, the first name 556, and the last name 558 specify "fields in the employee table" (Barnes at column 12, lines 51-53), which does not teach or suggest "ordering the plurality of records in the report based on a sort rule in the model norm," as recited in claim 1.

The Barnes sum statement 560, as recited in Barnes at column 12, lines 56-65, recites that "another column, labeled 'Total Sales,' be included in the result set. The values in the "Total Sales" column are to contain the summation of all the products of the "Quantity" and "UnitPrice" fields of the "Order.sub.--Details" tables (see line 572), where the following two conditions are met: the "OrderID" of the "Order.sub.--Details" table matches the "OrderID" of the "Orders" table (lines 570, 578); and the "EmployeeID" of the "Employees" table matches the "EmployeeID" of the "Orders" table (line 576)," which does not teach or suggest "ordering the plurality of records in the report based on a sort rule in the model norm," as recited in claim 1.

The Barnes statements 562 and 564, as recited in Barnes at column 13, lines 2-13: "instruct the DBMS to include two additional columns, containing strings of characters, to the result set. These strings of characters constitute "metadata," that is, definitional data used to describe the context, quality, and relational characteristics of the non-metadata data of the result set. In accordance with the present invention, it is by constructing a DQL query to create metadata that the DQL programmer defines linking relationships between the report to be generated by the parameters of FIG. 5, and other drill-down reports (whose parameters are specified elsewhere, for example, as shown in

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FIG. 8),” which does not teach or suggest “ordering the plurality of records in the report based on a sort rule in the model norm,” as recited in claim 1.

The Barnes group by statement 580 specifies the columns that are not part of the sum aggregate function, which does not teach or suggest “ordering the plurality of records in the report based on a sort rule in the model norm,” as recited in claim 1.

Thus, Figure 5 of Barnes does not teach or suggest: “ordering the plurality of records in the report based on a sort rule in the model norm,” as recited in claim 1 because Barnes does not provide any ordering of records.

The default value of Pearson does not make up for the Barnes deficiencies that are previously argued above. The Tabb highlight that indicates additional information is available does not make up for the Barnes deficiencies that are previously argued above.

Claims 6, 11, and 16 recite similar elements as previously argued above for claim 1 and are patentable over the references for similar reasons as those argued above. Claims 4, 5, 7-10, 13-15, and 18-20 are dependent on claims 1, 6, 11, and 16, and are patentable over the references for the reasons argued above.

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Conclusion

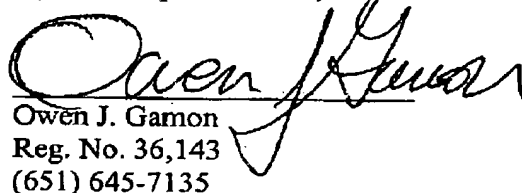
Applicant respectfully submits that the claims are in condition for allowance and notification to that effect is requested. The Examiner is invited to telephone Applicant's attorney (651-645-7135) to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 09-0465.

Respectfully submitted,

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By their Representative,


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CERTIFICATE UNDER 37 CFR 1.8: I hereby certify that this correspondence is being transmitted via facsimile to the Commissioner for Patents 571-273-8300, on November 22, 2006.

Owen J. Gamon
Name


Signature